

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
GARY GRANT	:	VIOLATIONS:
	:	18 U.S.C. § 1951(a) (interference with
	:	commerce by robbery - 6 counts)
	:	18 U.S.C. § 1951(a) (interference with
	:	commerce by attempted robbery - 1
		count)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. The Exxon station located at 2330 Aramingo Avenue, Philadelphia, Pennsylvania, sold gasoline, cigarettes, and packaged goods that traveled in interstate commerce and was an enterprise which affected interstate commerce.
2. On or about February 9, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

GARY GRANT

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant GRANT unlawfully took and obtained approximately \$300 cash from employees of the Exxon station and against their will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the

employees, that is, by pointing a firearm at the employees, demanding money, and threatening the employees.

In violation of Title 18, United States Code, Section 1951(a).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Two Street Pizza, located at 1616 South 2nd Street, Philadelphia, Pennsylvania, was a restaurant that sold pizza, fast food, soft drinks, and packaged goods that traveled in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about March 7, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

GARY GRANT

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant GRANT unlawfully took and obtained at least \$100 cash from an employee of Two Street Pizza and against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee, that is, by pointing a firearm at the employee, demanding money, and threatening the employee.

In violation of Title 18, United States Code, Section 1951(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Jackson Village Pizza, located at 2151 South 22nd Street, Philadelphia, Pennsylvania, was a restaurant that sold pizza, fast food, soft drinks, and packaged goods that traveled in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about March 11, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

GARY GRANT

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant GRANT unlawfully took and obtained at least \$150 cash from an employee of Jackson Village Pizza and against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee, that is, by pointing a firearm at the employee, demanding money, and threatening the employee.

In violation of Title 18, United States Code, Section 1951(a).

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Queen Village Pizza, located at 825 South 4th Street, Philadelphia, Pennsylvania, was a restaurant that sold pizza, fast food, soft drinks, and packaged goods that traveled in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about March 14, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

GARY GRANT

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant GRANT unlawfully took and obtained at least \$35 cash from an employee of Queen Village Pizza and against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee, that is, by pointing a firearm at the employee, demanding money, and threatening the employee.

In violation of Title 18, United States Code, Section 1951(a).

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Father and Son's Pizza, located at 2500 Frankford Avenue, Philadelphia, Pennsylvania, was a restaurant that sold pizza, fast food, soft drinks, and packaged goods that traveled in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about April 9, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

GARY GRANT

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant GRANT unlawfully took and obtained at least \$300 cash from an employee of Father and Son's Pizza and against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee, that is, by pointing a firearm at the employee, demanding money, and threatening the employee.

In violation of Title 18, United States Code, Section 1951(a).

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

At all times material to this indictment:

1. Santucci's Pizza, located at 4019 O. Street, Philadelphia, Pennsylvania, was a restaurant that sold pizza, fast food, soft drinks, and packaged goods that traveled in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about April 17, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

GARY GRANT

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant GRANT unlawfully took and obtained at least \$400 cash from an employee of Santucci's Pizza and against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee, that is, by pointing a firearm at the employee, demanding money, and threatening the employee.

In violation of Title 18, United States Code, Section 1951(a).

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES:

At all times relevant to this indictment:

1. The Pizza Shack Restaurant, located at 1500 Porter Street, Philadelphia, Pennsylvania, was a restaurant that sold pizza, fast food, soft drinks, and packaged goods that traveled in interstate commerce and was an enterprise which affected interstate commerce.

2. On or about March 5, 2009, in Philadelphia, in the Eastern District of Pennsylvania, defendant

GARY GRANT

obstructed, delayed and affected commerce and the movement of articles and commodities in commerce, and attempted to do so, by robbery, in that, defendant GRANT unlawfully attempted to take and obtain money and other property from an employee of the Pizza Shack Restaurant and against the employee's will, by means of actual and threatened force, violence, and fear of injury, immediate and future to the employee, that is, by pointing a dangerous weapon at the employee, demanding money, and threatening the employee.

In violation of Title 18, United States Code, Section 1951(a).

TRUE BILL:

GRAND JURY FOREPERSON

MICHAEL LEVY
UNITED STATES ATTORNEY